

(b) Discovery shall commence on September 1, 2019. All discovery commenced in time to be completed by June 1, 2020.

- (c) Maximum of 20 interrogatories by each party to each party. Responses due 45 days after service.
- (d) Maximum of 10 requests for admission by each party to each party. Responses due 45 days after service.
- (e) Maximum of 20 requests for production of documents by each party to each party. Responses due 45 days after service.
- (f) Maximum of 10 depositions by Plaintiffs and 10 depositions by Defendants. Depositions shall be limited to seven hours unless extended by agreement of the parties or by Order of the Court.
- (g) Reports from retained experts under Rule 26(a)(2) due:
 - (i) From Plaintiffs: by May 1, 2020
 - (ii) From Defendants: by April 1, 2020
- (h) Supplementation under Fed. R. Civ. P. Rule 26(e) and Local Rule 26.1 due reasonably upon knowledge of additional information.

3. Other Items.

- (a) The parties do not request a conference with the Court before entry of the scheduling order.
- (b) The parties request a pretrial conference on or around October 1, 2020.
- (c) Deadlines for Joining Additional Parties and Amending Pleadings: September 1, 2019.
- (d) All potentially dispositive motions should be filed on or before July 1, 2020.
- (e) Plaintiffs wish to resolve this litigation by settlement at the earliest possible date. Defendants do not object to an early resolution of this litigation. The parties are willing to discuss possible mediation of this litigation.
- (f) Final lists of trial evidence under Rule 26(a)(3), both witnesses and exhibits, should be due from the parties on or before September 1, 2020.
- (g) Parties should have 14 days after services of final lists of trial evidence to list objections under Rule 26(a)(3).
- (h) This case should be ready for trial by this Court's November 2020 non-jury trial term. At this time, the trial is expected to take approximately 3 days.
- (i) The parties' agreement to the schedule proposed herein is contingent upon the timely receipt of documents and timely compliance with other aspects of the

Federal Rules of Civil Procedure and orders of this Court. The parties reserve the right to move the Court to amend this schedule if documents are not produced in conformance with the Rules, if other obstacles are created by non-compliance with the Federal Rules of Civil Procedure or orders of this court, or if other unforeseen circumstances arise.

Respectfully submitted this the 23rd day of July, 2019.

/s/ Terrell E. McCants

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